REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed May 15, 2007.
Claims 1-18 were pending in the present application. Claims 1, 2, and 5-18 have been amended,
and claim 3 has been canceled. Accordingly, claims 1, 2, and 4-18 remain pending in the present
application after entry of this Amendment. Reconsideration of the rejected claims is respectfully
requested.

Telephonic Interview

Applicants would like to thank Examiner Pham and Examiner Truong for the
telephonic interview regarding this application conducted on August 22, 2007. Independent
claim 1 was discussed in light of Szabo et al. (US Patent No. 6,768,486, hereinafter "Szabo"). In
particular, amendments to the claim to clarify the differences between the claim and Szabo were
discussed.

Examiner Pham indicated that the discussed amendments differentiate claim 1
from Szabo, thereby overcoming the §102(e) rejection of claim 1. The amendments and the
related arguments for patentability are discussed below.

35 U.S.C. §102(e) Rejection of Claims 1, 4, 6, 7, 14, 17, and 18

Claims 1, 4, 6, 7, 14, 17, and 18 are rejected under 35 U.S.C. §102(e) as being
anticipated by Szabo et al. (US Patent No. 6,768,486, hereinafter "Szabo"). Applicants
respectfully submit that Szabo does not disclose each feature of these claims.

Embodiments of the present invention relate to techniques for building computer
graphics models that incorporate shared components. Although computer graphics models may
be complex and unique, they often have features in common. Thus, it is desirable to allow the
creation of shared components that can be referenced and used in many different model files.

As described in the Amendment filed on February 5, 2007, one aspect of the
present invention is the definition of public and private attributes for a shared component. A
public attribute is an attribute of the shared component whose value may be overridden by users

(*e.g.*, modelers) that reference the shared component in a model. In contrast, a private attribute is an attribute of the shared component whose value cannot be changed by users that reference the shared component in a model. (Specification: para. 52-53).

In one set of embodiments, information identifying the public and private attributes of a shared component (*i.e.*, which attributes are public and which attributes are private) is included as part of the specification of the shared component. (See Specification: para. 51-53; see also Fig. 3, step 330). Thus, any user that references the specification of the shared component is constrained by the public/private attribute information defined therein. In this manner, a creator of the shared component may control how downstream users use the shared component in their models. For example, as noted in the Specification:

> Allowing a user/modeler to specify some model data as private data. . .
> preserves the right of the modeler to make subsequent changes to an object model that will not
> conflict with uses of the object model [by other modelers]. For instance, if a hand modeler does
> not lock the number of fingers, subsequent models that refer to the hand model may specify that a
> hand has six fingers. However at a later time, if the hand modeler decides that hands should have
> only five fingers, the updated hand model would conflict with the hand object having six fingers.
> Accordingly, by keeping certain data private, the hand modeler can make a change from four
> fingers to five fingers, without causing conflicts in other models.

(Specification: para. 52).

Accordingly, independent claim 1 recites in part:

> receiving a second file in response to the reference to the second object, the
> second file including a specification of the second object, the specification of the second object
> including information identifying a plurality of public attributes of the second object and a
> plurality of private attributes of the second object;. . .

> wherein values for the plurality of private attributes of the second object cannot
> be modified by users of the first file.

(Applicants independent claim 1, as amended, emphasis added).

Applicants submit that at least the above recited features are not disclosed by Szabo.

Szabo is directed to techniques for applying modifications to a base geometry object through a "stack" mechanism to create a derived object. (Szabo: col. 2, lines 45-47: "a sequential ordering of components in the form of a stack may be used to create and modify the

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geometry object."). As shown in FIG. 2A of Szabo, a "taper" modifier 228 and a "bend" modifier 226 are applied to a base geometry object 224 in a modifier stack 214. As a result, the representation of the base geometry object depicted in window 200 is modified according to the parameters of the taper and bend modifiers. Fig. 2B of Szabo illustrates a flowchart representation of modifier stack 214.

Applicants submit that the above is very different from the claimed embodiments of the present invention. For example, Szabo does not teach anything about "receiving a second file in response to the reference to the second object, the second file including a specification of the second object, the specification of the second object including information identifying. . . a plurality of private attributes of the second object" wherein "values for the plurality of private attributes of the second object cannot be modified by users of the first file" as recited in amended claim 1.

The Office Action asserts that Szabo discloses private attributes of a second (*i.e.*, shared) object because Szabo describes inserting an "XModifier" 302 into modifier stack 214: "XModifier data 350 causes an XTC object to be associated with the geometry object. . . the XTC object can take appropriate actions, such as to ensure that certain defined properties and/or constraints are allowed to flow up the modifier stack and/or to influence changes that are made by higher-ordered components within the modifier stack." (Szabo: col. 19, lines 33-57). The Office Action asserts that "the 'constraints' are interpreted to be essentially the same as private attributes." (Office Action: pg. 3). Applicants respectfully disagree.

As an initial matter, nowhere does Szabo disclose or suggest that XModifier 302 or its corresponding constraints are included as part of the specification of base geometry object 224. Rather, as best understood, XModifier 302 is simply another modifier component (such as taper modifier 228 and bend modifier 226) that may be applied by a user on top of base geometry object 224 in modifier stack 214 to generate a derived object. As described in Szabo, "a user interacts with user interface window 300 to define, for XModifier 302, a minimum size constraint for faces within the geometry object and to insert XModifier 302 into modifier stack 214." (Szabo: col. 20, lines 1-5). Thus, XModifier 302 and its corresponding constraints are defined by a user during the process of creating a derived object from a base object; XModifier

302 is <u>not included in the specification the base geometry object itself</u>. Accordingly, Szabo fails to teach or suggest "receiving a second file in response to the reference to the second object, the second file including a specification of the second object, the specification of the second object including information identifying. . . a plurality of private attributes of the second object" as recited in amended claim 1.

Further, Szabo fails to disclose or suggest "wherein <u>values for the plurality of private attributes of the second object cannot be modified by users of the first file</u>" as recited in amended claim 1. As described above, XModifier 302 is simply a stack component that is defined by a user that is referencing base geometry object 224 to create a derived object (*e.g.*, user of the first file). The user is free to remove XModifier 302 from modifier stack 214, or relocate it to a different position within the stack. (Szabo: col. 20, lines 48-62). Thus, the user may <u>freely modify or eliminate the constraints</u> imposed by XModifier 302. Since the user may modify the constraints (*i.e.*, private attributes) as he/she sees fit, Szabo necessarily fails to disclose or suggest private attributes for a second object where "values for the plurality of private attributes of the second object cannot be modified by users of the first file" as recited in amended claim 1.

For at least the foregoing reasons, Szabo does not anticipate or render obvious Applicants' amended claim 1. Thus, Applicants respectfully request that the rejection of claim 1 be withdrawn.

Dependent claims 4, 6, and 7 depend from claim 1, and are thus believed to be allowable for at least a similar rationale as discussed for claim 1, and others.

Independent claim 14 recites limitations that are substantially similar to claim 1, and is thus believed to be allowable for at least a similar rationale as discussed for claim 1, and others.

Dependent claims 17 and 18 depend from claim 14, and are thus believed to be allowable for at least a similar rationale as discussed for claim 14, and others.

35 U.S.C. §103(a) Rejection of Claims 2, 3, and 5

Claims 2, 3, and 5 are rejected under 35 U.S.C. §103(a) as being unpatentable over Szabo and further in view of Buxton et al. (US Patent No. 5,970,252, hereinafter "Buxton"). Applicants respectfully submit that Szabo and Buxton, considered individually or in combination, do not teach or suggest the features of these claims.

Claim 3 has been canceled without prejudice. Accordingly, the rejection of claim 3 is moot.

Dependent claims 2 and 5 depend from claim 1, and the rejection of claims 2 and 5 is premised on the assertion that Szabo discloses the features recited in claim 1, and Buxton discloses the remaining features of claims 2 and 5.

As discussed above, however, Szabo does not disclose or suggest all of the features recited in claim 1. Buxton does not provide any teaching or suggestion that would remedy these deficiencies. Buxton is directed to a method for loading application components in an object-oriented computing system. (See Buxton: col. 2, lines 20-30). As best understood, Buxton does not teach or suggest "receiving a second file in response to the reference to the second object, the second file including a specification of the second object, the specification of the second object including information identifying. . . a plurality of private attributes of the second object" wherein "values for the plurality of private attributes of the second object cannot be modified by users of the first file" as recited in claim 1. Accordingly, Applicants submit that even if Szabo were combined with Buxton (although there appears to be no motivation to combine), the resultant combination would not teach or suggest the various features recited in claims 2 and 5.

For at least the foregoing reasons, Applicants respectfully request that the rejection of claims 2 and 5 be withdrawn.

35 U.S.C. §103(a) Rejection of Claims 8-13

Claims 8-13 are rejected under 35 U.S.C. §103(a) as being unpatentable over Szabo in view of Kross et al. (US Patent No. 6,285,369, hereinafter "Kross"). Applicants

respectfully submit that Szabo and Kross, considered individually or in combination, do not teach or suggest the features of these claims.

Independent claim 8 recites limitations that are substantially similar to claim 1. Accordingly, Applicants submit that claim 8 is not rendered obvious by Szabo for at least a similar rationale as discussed for claim 1.

The deficiencies of Szabo in this regard are not remedied by Kross. Kross is directed to an electronic notebook for maintaining design information. (Kross: Abstract). As best understood, Kross makes no reference to "a storage system configured to store. . . a second file including a specification of a second object, the specification of the second object including information identifying. . . a plurality of private attributes of the second object" wherein "values for the plurality of private attributes of the second object cannot be modified by users of the first file" as recited in claim 8. Accordingly, Applicants submit that even if Szabo were combined with Kross (although there appears to be no motivation to combine), the resultant combination would not teach or suggest the various features recited in claim 8.

Dependent claims 9-13 depend from claim 8, and are thus believed to be allowable for at least a similar rationale as discussed for claim 8, and others.

For at least the foregoing reasons, Applicants respectfully request that the rejection of claims 8-13 be withdrawn.

Amendments to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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